

**REMARKS**

This Amendment is filed in response to the Office action dated August 10, 2007.  
All objections and rejections are respectfully traversed.

Claims 1-72 are pending.

Please amend 1, 16, 22, 28, 34, 39, 41, 44, 49, 54, and 69.

**Request for Interview**

The Applicant respectfully requests a telephonic interview with the Examiner after the Examiner has had an opportunity to consider this Amendment, but before the issuance of the next Office Action. The Applicant may be reached at 617-951-3067.

**Claim rejections – 35 U.S.C. §112**

At paragraph 5 of the Office Action Claims 1-33 were rejected under 35 U.S.C. §112 as failing to comply with the enablement requirements. Applicant has amended independent claims 1, 16, 22, and 28.

Accordingly, it is believed that claims 1, 16, 22 and 28 are in condition for allowance. Further, dependent claims 2-15, 17-21, 23-27 are dependent from independent claims which are believed to be in condition for allowance. Thus, dependent claims 22-15, 17-21, 23-27 are believed to be in condition for allowance.

**Claim rejections – 35 U.S.C. §102**

At page 7 of the Office Action claims 1, 16, 22, 28, 34, 39, 41, 44, 49, 69, and 71 were rejected under 35 U.S.C. §102(b) as being anticipated by Permut et al. U.S. Patent No. 6,260,115, issued July 10, 2001, hereinafter (“Permut”).

The present invention, as set forth in representative claim 1, comprises in part:

1. A method for a storage operating system implemented in a storage system to optimize an amount of readahead data retrieved from a data container of the storage system, the method comprising:

*receiving a client read request for a particular read stream at the storage system;*

*locating a readset data structure for the particular read stream;*

*determining whether the storage operating system is permitted to retrieve readahead data from the data container in response to the received client read request;*

*if it is determined that the storage operating system is permitted to retrieve readahead data from the data container, performing the steps of:*

*(i) selecting an amount of readahead data to retrieve from the data container based on a plurality of factors stored within the readset data structure; and*

*(ii) retrieving the selected amount of readahead data from the data container.*

Permut discloses a method for detecting and remembering sequential access patterns for the purpose of prestaging tracks ahead of the current access request. Specifically, the number of tracks requested to be prestaged ahead may be responsive to the amount of storage available in the cache memory.

Applicant respectfully urges that Permut has no disclosure of Applicant's claimed novel

*receiving a client read request for a particular read stream at the storage system;*

*locating a readset data structure for the particular read stream;*

*determining whether the storage operating system is permitted to retrieve readahead data from the data container in response to the received client read request;*

*if it is determined that the storage operating system is permitted to retrieve readahead data from the data container, performing the steps of:*

*(i) selecting an amount of readahead data to retrieve from the data container based on a plurality of factors stored within the readset data structure; and*

*(ii) retrieving the selected amount of readahead data from the data container.*

Particularly, Applicant respectfully urges that Permut has no disclosure of Applicant's claimed *receiving a client read request for a particular read stream at the storage system; locating a readset data structure for the particular read stream*.

The examiner urged that "Any such use of commands or flags requires some format or organizational scheme of the data (of the commands or flags) to be recognized so that the data therein may be used as desired." (Office Action, paragraph 8).

Applicant respectfully submits that Permut has no disclosure of Applicant's claimed readset data structures, and clearly has no disclosure of Applicant's claimed *locating a readset data structure for the particular read stream*. That is, Permut fails to disclose Applicant's novel, locating a *readset data structure for the particular read stream*. Said differently, Applicant's system "manages a separate set of readahead meta-data for each read stream." (See Applicant's Specifications, Page 6, Lines 18-19).

Applicant respectfully asserts that Permut does not disclose Applicant's claimed novel claimed *receiving a client read request for a particular read stream at the storage system; locating a readset data structure for the particular read*.

### **Claim rejections – 35 U.S.C. §103**

At paragraph 29 of the Office Action claim 15 was rejected under 35 U.S.C. 103(a) as being unpatentable over Permut and further in view of Vishlitzky et al. U.S. Patent No. 5,649,156, issued July 15, 1997 (hereinafter "Vishlitzky").

Applicant respectfully notes that claim 15 is a dependent claim that is dependent from an independent claim which is believed to be in condition for allowance. Accordingly, claim 15 is believed to be in condition for allowance.

All independent claims are believed to be in condition for allowance.

All dependent claims are dependent from independent claims which are believed to be in condition for allowance. Accordingly, all dependent claims are believed to be in condition for allowance.

Favorable action is respectfully solicited.

Please charge any additional fee occasioned by this paper to our Deposit Account  
No. 03-1237.

Respectfully submitted,

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